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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room TW-A306
445 12th Street, S.W.
Washington, D.C. 20554

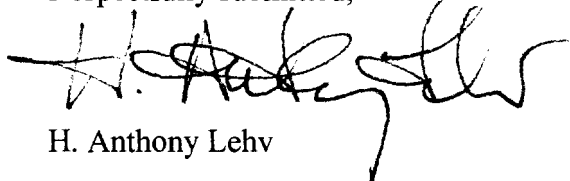
Re: Comments in MM Docket 99-325

Dear Ms. Salas:

On behalf of Entercom Communications Corp., I hereby submit an original and four copies of the company's Comments in the above-referenced rulemaking proceeding. Copies of the company's comments are being submitted on diskette to William J. Scher at the Commission and to International Transcription Service, Inc., as set forth in Paragraph 61 of the Commission's November 1, 1999, Notice of Proposed Rulemaking.

Please direct any questions concerning this filing to the undersigned.

Respectfully submitted,



H. Anthony Lehv

cc on diskette (via hand delivery): William J. Scher (FCC Room 2-A445)
International Transcription Service, Inc.

No. of Copies rec'd
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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Digital Audio Broadcasting Systems)
And Their Impact On the Terrestrial Radio)
Broadcast Service.)

MM Docket No. 99-325

**COMMENTS OF ENTERCOM COMMUNICATIONS CORP.
REGARDING DIGITAL AUDIO BROADCASTING SYSTEMS AND THEIR IMPACT
ON THE TERRESTRIAL RADIO BROADCAST SERVICE**

Entercom Communications Corp., a Pennsylvania Corporation ("Entercom"), submits the following Comments Regarding Digital Audio Broadcasting Systems And Their Impact On the Terrestrial Radio Broadcast Service, in response to the Notice of Proposed Rule Making released by the Federal Communications Commission ("FCC") on November 1, 1999 ("NPRM").

Entercom supports the adoption of in-band, on-channel ("IBOC") with hybrid analog and digital operating parameters as the preferred approach to digital audio broadcasting technology, provided that it allows protection from interference to co-channel and adjacent channels which continue to do analog mode broadcasting.

While Entercom supports a digital/analog hybrid IBOC, it does not think that the FCC should at this time set any time period after which stations would be relieved from an obligation to protect their own stations or co or adjacent channel stations which continue to broadcast in analog mode.¹ Presently, there are millions of consumers who use analog receivers. The general public

¹The FCC states in the NPRM that "USADR proposes to restrict digital stations to hybrid operating parameters for a period of 12 years to provide a reasonable transition to an all-digital radio broadcast service. At the end of this transition period, USADR proposes a sunset on protection of analog signals, with the initiation of 'all-digital' signals." See NPRM at p. 5. It is our understanding that USADR maintains that their reference to 12 years was an estimate of a minimum period during which analog broadcasting should be fully protected from interference from an all digital mode, and that they agree that any transition to an all

should continue to be protected in their use of analog technology until such time as the FCC determines that, as a result of market forces, the proliferation of digital-capable receivers has largely replaced analog receivers as a means of radio broadcasting listening. Until such time, it is our belief that the FCC should protect interference free analog reception in order to assure that consumers who do not have access to digital-capable receivers will continue to have access to their source of news and entertainment broadcasting.

It is impossible to predict whether and when the general public will respond to digital technology by replacing existing analog receivers with digital-capable receivers. Therefore, it would be a mistake at this time to establish a time limit on interference protection for analog broadcasting. Such an arbitrary “sunset” would permit the elimination of analog broadcasting by some broadcasters who would choose to switch to an all digital mode at the cost of interference with the analog transmissions of others at a time when market forces may not have substantially replaced analog receivers with digital-capable ones. Any such decision should await a determination by the FCC that market forces have produced such a substantial replacement of analog receivers with digital-capable receivers as to minimize the economic and social consequences which will result from such an action, including the impact on significant portions of our society which may still rely on analog reception.

In conclusion, Entercom supports IBOC but strongly urges the FCC to refrain from establishing any “sunset” period for the elimination of interference protection for analog receivers until market forces have substantially replaced analog receivers with digital-capable receivers as the receiver of choice by the general public.

digital mode should await a subsequent decision by the FCC that market forces have caused analog receivers to be substantially replaced by digital-capable receivers.

Respectfully submitted,

ENTERCOM COMMUNICATIONS CORP.

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A handwritten signature in dark ink, appearing to read "Joseph M. Field", is written over a horizontal line.

Joseph M. Field

John C. Donlevie

Reed J. Slogoff

Date: January 21, 1999